

ORIGINAL

FILED
DISTRICT COURT OF GUAM

OCT 28 2005 *

MARY L.M. MORAN
CLERK OF COURT

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7 Attorneys for the United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 FOR THE TERRITORY OF GUAM

10 11 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 05-00053-01

12 Plaintiff.)
13 vs.) STIPULATION OF THE PARTIES
14) TO CONTINUE TRIAL DATE

15 Defendant.)

16
17 COMES NOW the United States, and respectfully requests and moves this Honorable
18 Court for an Order continuing the trial date in the above entitled cause, which is currently
19 scheduled for Tuesday, November 8, 2005 at 9:30 a.m., to Monday, January 9, 2006 at 9:30 a.m.

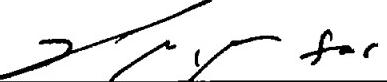
20 The United States makes this request because government counsel, Russell C. Stoddard,
21 is currently off-island on emergency leave. The nature of the emergency is that he had to assist
22 his wife with their home in Ft. Myers, Florida, in anticipation of Hurricane Wilma. During
23 clean-up after the storm, Mrs Stoddard fell and broke her wrist and will require surgery which
24 will delay AUSA Stoddard's return currently scheduled for November 8, 2005, until a week later.
25 This case would be a real burden for another AUSA to pick up and try on such short notice.

26 Attorney G. Patrick Civille, counsel for defendant, had spoken to his client, and his client

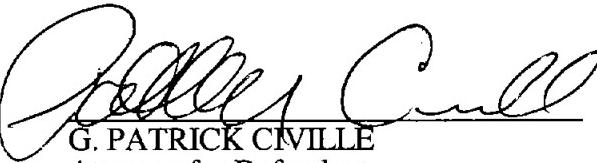
1 has expressed no objections to the continuance of this trial. A request to continue the trial would
2 enable the defendant to obtain new counsel, as defendant has just filed a Motion to Discharge
3 Counsel and For Appointment of New Counsel.

4 Respectfully submitted this 28th day of October, 2005.

5 LEONARDO M. RAPADAS
6 United States Attorney
7 Districts of Guam and NMI

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9 RUSSELL C. STODDARD
First Assistant U.S. Attorney

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G. PATRICK CIVILLE
Attorney for Defendant

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